

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHAD STANBRO,

Plaintiff,

-against-

**PLAINTIFF'S PROPOSED**  
**VOIR DIRE QUESTIONS**

WESTCHESTER COUNTY HEALTH  
CARE CORPORATION, WESTCHESTER  
MEDICAL CENTER, FRANK WEBER and  
JOHN FULL,

19-cv-10857-KMK

Defendants.

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

CHAD STANBRO,

Plaintiff,

-against-

CORRECTION OFFICER NADYA PALOU,  
CORRECTION OFFICER RAYMOND DEAL,  
CORRECTION OFFICER KRISTOFER LEONARDO,  
CORRECTION OFFICER RICHARD LANDRY,  
CORRECTION NURSE GARY PAGLIARO and  
CORRECTION SERGEANT ENRIQUE TORRES,

20-cv-01591-KMK

Defendants.

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Plaintiff respectfully requests that the Court pose the following questions to prospective jurors during the voir dire, in addition to the standard questions regarding familiarity with the parties, their lawyers, and the prospective witnesses to be called at trial:

1. Have you or has anyone you know ever worked for or at Fishkill Correctional Facility or in any other capacity by the New York State Department of Corrections and Community Supervision? If so, explain. Do you believe that would affect your ability to be a fair and impartial juror in this case?

2. Have you or any of your friends or family members ever worked as a correction officer or in any other capacity in a jail or prison? If so, explain. Do you believe that would affect your ability to be a fair and impartial juror in this case?

3. Have you or any of your friends or family members ever been employed by the State of New York? If so, explain. Do you believe that would affect your ability to be a fair and impartial juror in this case?

4. Have you or any of your friends or family members ever been employed in law enforcement? If so, explain. Do you believe that would affect your ability to be a fair and impartial juror in this case?

5. Have you or has anyone you know ever worked for or at Westchester Medical Center? If so, explain. Do you believe that would affect your ability to be a fair and impartial juror in this case?

6. Have you or any of your friends or family members ever worked as a dentist or oral surgeon, or been employed by a dentist or oral surgeon? If so, explain. Do you believe that would affect your ability to be a fair and impartial juror in this case?

7. In this case, some of the defendants are represented by attorneys employed by the New York State Attorney General's Office. Do you understand that that has no significance on the issue of whether those defendants engaged in any wrongful conduct toward the plaintiff?

8. Do you have any problem with or objection to that aspect of our legal system that entitles one to recover monetary damages as compensation for injuries caused by another's wrongful conduct?

9. Do you have any problem with or objection to that aspect of our legal system that entitles one to recover punitive damages, that is monetary damages to punish another for malicious conduct?

10. Do you believe that one who is convicted of a crime and incarcerated should lose all of his rights?

11. Do you believe that one who is convicted of a crime and incarcerated automatically deserves whatever happens to him while in custody?

12. Do you believe that an incarcerated individual is entitled to monetary compensation if he proves that he was wrongfully injured or that his rights otherwise were violated while he was in prison?

13. Have you or any of your friends or family members ever been a victim of a crime? If so, explain. Do you believe that would affect your ability to be a fair and impartial juror in this case?

14. Do you believe that a correction officer or other witness who is employed by DOCCS is any more or less likely to give truthful testimony than any other witness?

15. Do you believe that a doctor or other healthcare provider is any more or less likely to give truthful testimony than any other witness?

16. Do you believe that a formerly incarcerated individual is any more or less

likely to give truthful testimony than any other witness?

17. If a prison official and a formerly incarcerated individual give conflicting testimony about the same incident, would you automatically believe one over the other?

18. Would the fact that plaintiff previously was convicted of a crime and sentenced to prison prevent you from awarding monetary damages to plaintiff, if you conclude that plaintiff otherwise is legally entitled to monetary damages?

19. Have you ever been a plaintiff in a lawsuit? If so, what was the nature of the lawsuit, and will your experience in that lawsuit affect your ability to be a fair and impartial juror in this case?

20. Have you ever been a defendant in a lawsuit? If so, what was the nature of the lawsuit, and will your experience in that lawsuit affect your ability to be a fair and impartial juror in this case?

Dated: New York, New York  
June 2, 2022

Yours, etc.  
SIVIN, MILLER & ROCHE, LLP

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